

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MARGARET RATNER KUNTSLER, DEBORAH
HRBEK, JOHN GOETZ & CHARLES GLASS,

Plaintiffs,

22-Civ-6913 (JGK)

- vs. -

**DECLARATION OF
NIAMH QUILLE**

CENTRAL INTELLIGENCE AGENCY, MICHAEL R.
POMPEO, DAVID MORALES GUILLEN
and UNDERCOVER GLOBAL S.L.,

Defendants.
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Niamh Quille declares the following statements are true:

1. I am over 18 years of age and I am otherwise competent to testify, and I have personal knowledge of the information contained in this Declaration.
2. Birnberg Peirce are the London-based firm who represent Julian Assange in the defending his extradition to the United States of America. I have worked as an assistant to Mr Assange's solicitor, Gareth Peirce, in this matter since July 2019.
3. As part of the extradition proceedings, the statements annexed hereto as Exhibits 1-3 were filed with the Magistrates' Court on behalf of the defence in preparation for the first instance hearings before District Judge Baraitser in 2020¹. Those hearings took place between 24 February 2020 – 27 February 2020 and 7 September 2020 – 1 October 2020.
4. Exhibit 1 is a witness statement of Aitor Martinez Jimenez dated 21 February 2020. Exhibit 2 is the statement of a protected witness in the criminal complaint against UC

¹ The Judgment of District Judge Baraitser dated 4 January 2021 can be accessed here:
<https://www.judiciary.uk/judgments/usa-v-julian-assange/>

Global/David Morales in Spain. This witness is known in the proceedings in England & Wales as ‘Witness 1’. Exhibit 3 is also the statement of a protected witness in the Spanish proceedings, known in the proceedings in England and Wales as ‘Witness 2’.

5. Unredacted versions of the Statements of Witness 1 and Witness 2 were filed at Court and served on the Crown Prosecution Service in advance of the hearings. Exhibit 1, Exhibit 2 (in redacted form) and Exhibit 3 (in redacted form) became publicly available on 30 September 2020 when they were referred to in open court. Redactions were necessary to protect the identities of the witnesses who had been granted protected status by the Spanish Court. The Magistrates' Court then communicated to the Press Association, and to other journalists and press organizations, these statements (subject to the redactions agreed by the parties).

6. Exhibits 1-3 have therefore become publicly available since the hearing and are presently accessible online². For example:

- i. Exhibit 1 is accessible at: <https://www.tareqhaddad.com/wp-content/uploads/2020/10/2020.09.30-%E2%80%93Assange-Extradition-Hearings-%E2%80%93Aitor-statement-3-from-Vol-N-1.pdf>
- ii. Exhibit 2 is accessible at: <https://www.tareqhaddad.com/wp-content/uploads/2020/10/2020.09.30-Assange-Extradition-Hearings-UC-Global-Anonymous-Witness-1.pdf>
- iii. Exhibit 3 is accessible at: <https://www.tareqhaddad.com/wp-content/uploads/2020/10/2020.09.30-Assange-Extradition-Hearings-UC-Global-Anonymous-Witness-2.pdf>

² At 19 May 2024

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Executed this 20 day of May 2024.



Niamh Quille